

1 DAVID CHIU, State Bar #189542  
City Attorney  
2 KATHARINE HOBIN PORTER, State Bar #173180  
Chief Labor Attorney  
3 IAN H. ELIASOPH, State Bar #227557  
Deputy City Attorney  
4 Fox Plaza  
1390 Market Street, 5th Floor  
5 San Francisco, California 94102-5408  
Telephone: (415) 554-3864  
6 Facsimile: (415) 554-4248  
E-Mail: ian.eliasoph@sfcityatty.org

7 Attorneys for Defendant  
8 CITY AND COUNTY OF SAN FRANCISCO

9 ANGELA M. ALIOTO (SBN 130328)  
JORDANNA THIGPEN (SBN 232642)  
10 LAW OFFICES OF JOSEPH L. ALIOTO  
AND ANGELA ALIOTO  
11 700 Montgomery Street  
San Francisco, CA 94111-2104  
12 Telephone: (415) 434-8700  
Facsimile: (415) 438-4638  
13 Email: jgt@aliotolawoffice.com

14 Attorneys for Plaintiff  
SARAH PERATA  
15

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18

19 SARAH PERATA,

20 Plaintiff,

21 vs.

22 CITY AND COUNTY OF SAN  
FRANCISCO,

23 Defendant.  
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Case No. 21-CV-02819-SBA

**STIPULATION AND JOINT REQUEST FOR  
AN ORDER MODIFYING SCHEDULING  
ORDER RE: EXPERT DISCOVERY  
DEADLINES; ORDER**

**STIPULATION AND [PROPOSED] ORDER**

**IT IS STIPULATED BY THE PARTIES BY AND THROUGH THEIR COUNSEL AS FOLLOWS:**

1. The Court previously entered a Scheduling Order (Dkt. 16), which was later amended on March 2, 2022 (Dkt. 31), and thereafter two depositions were permitted after the cutoff for scheduling purposes (Dkt. 39).

2. The Parties to this action have been diligently engaged in discovery and have met and conferred, but despite their best efforts, and due to the necessity to coordinate scheduling of their witnesses and the Parties' other litigation matters, and the necessity of clarifying the expert discovery cutoff date, they have agreed to extend the expert disclosure, rebuttal, and expert discovery cutoff dates.

3. Therefore, the Parties wish to modify the fact discovery cutoff from the Court's Scheduling Order (Dkt. 16), as Amended (Dkt. 31) as follows:

<b>Event</b>	<b>Current Date</b>	<b>New/Existing Date</b>
Expert Disclosure	5/20/2022	<b>5/27/2022</b>
Rebuttal Disclosure	6/17/2022	<b>6/30/2022</b>
Expert Discovery Cutoff	6/3/2022	<b>7/22/2022</b>
Law and Motion Cutoff	8/10/2022	8/10/2022
Pretrial Preparation	9/21/2022	9/21/2022
MILS/Objections to Evidence	10/5/2022	10/5/2022
Responses to MILs	10/12/2022	10/12/2022
Replies	10/19/2022	10/19/2022
Pretrial Conference	11/9/2022	11/9/2022
Jury Trial (7-10 Days)	12/5/2022	12/5/2022

4. **IT IS HEREBY JOINTLY REQUESTED BY THE PARTIES**, by and through their respective counsel that the Scheduling Order, as Amended be modified to extend expert discovery, rebuttal, and cutoff dates as set forth above.

Respectfully submitted:

**OFFICE OF THE CITY ATTORNEY FOR THE CITY  
AND COUNTY OF SAN FRANCISCO**

DATED: 5/18/22

/s/ Ian H. Eliasoph

IAN H. ELIASOPH  
Attorneys for Defendant  
City and County of San Francisco

**LAW OFFICES OF JOSEPH L. ALIOTO  
AND ANGELA ALIOTO**

DATED: 5/18/22

/s/ Jordanna G. Thigpen

JORDANNA THIGPEN  
Attorneys for Plaintiff Sarah Perata

**ATTESTATION OF E-FILED SIGNATURE**

I, Jordanna G. Thigpen, am the ECF User whose ID and password are being used to file this  
**STIPULATION AND JOINT REQUEST FOR AN ORDER MODIFYING SCHEDULING  
ORDER RE: EXPERT DISCOVERY DEADLINES; [PROPOSED] ORDER.** In compliance with  
Local Rule 5-1(i)(3), I attest that Ian Eliasoph has read and approved this pleading and consents to its  
filing in this action.

**LAW OFFICES OF JOSEPH L. ALIOTO  
AND ANGELA ALIOTO**

DATED: 5/18/22

/s/ Jordanna G. Thigpen  
JORDANNA THIGPEN  
Attorneys for Plaintiff Sarah Perata

**ORDER**

The Court having reviewed the foregoing Stipulation, and good cause appearing therefore:

**IT IS HEREBY ORDERED** that the Scheduling Order (Dkt. 16), as Amended (Dkt. 31) is modified to extend the expert disclosure, rebuttal, and cutoff dates as set forth below:

Event	Current Date	New Date
Expert Disclosure	5/20/2022	<b>5/27/2022</b>
Rebuttal Disclosure	6/17/2022	<b>6/30/2022</b>
Expert Discovery Cutoff	6/3/2022	<b>7/22/2022</b>
Law and Motion Cutoff	8/10/2022	8/10/2022
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Pretrial Conference	11/9/2022	11/9/2022
Jury Trial (7-10 Days)	12/5/2022	12/5/2022

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: 5/20/2022

  
 SAUNDRA BROWN ARMSTRONG  
 Senior United States District Judge

RS